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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re : Chapter 11  
:  
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)  
:  
Debtors<sup>1</sup>. : (Jointly Administered)  
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**TWENTY SEVENTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC  
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF  
DECEMBER 1, 2021 THROUGH AND INCLUDING DECEMBER 31, 2021**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	December 1, 2021 – December 31, 2021
Total Amount of Fees Incurred:	\$49,834.50
Total Fees Requested (80%):	\$39,867.60
Total Reimbursement of Expenses Incurred:	\$56.36
Total Reimbursement of Expenses Requested (100%):	\$56.36
Total compensation and Reimbursement Requested in this Statement:	\$39,923.96
This is Applicant's:	Twenty Seventh Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated December 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Twenty Seventh Monthly Fee Statement (the "Fee Statement") for the period of December 1, 2021 through and including December 31, 2021 (the "Statement Period").

**Itemization of Services Rendered and Disbursements Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$49,834.50 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$39,867.60.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,191.53<sup>2</sup>. The Blended hourly rate of all paraprofessionals is \$345.00<sup>3</sup>. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$56.36 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

### **Notice**

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$39,867.60, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in

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<sup>2</sup> The blended hourly billing rate of \$1,191.53 is derived by dividing the total fees for attorneys of \$48,972.00 by the total hours of 41.1.

<sup>3</sup> The Blended hourly billing rate of \$345.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$862.50 by the total hours of 2.5.

connection with such services during the Statement Period (*i.e.*, \$49,834.50) and (ii) payment of \$56.36 for actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: January 26, 2022  
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski  
Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
230 Park Avenue  
New York, New York 10169  
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*Co-Counsel to the Ad Hoc Committee of  
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Litigation Claimants*

**EXHIBIT A**

**Fees By Project Category**

**SUMMARY OF COMPENSATION BY PROJECT CODE  
FOR THE STATEMENT PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
PU04	Case Administration	.3	\$103.50
PU06	Employment & Fee Applications	2.9	\$2,190.50
PU08	Litigation: Contest Matters, Adversary	7.4	\$7,507.50
PU09	Meetings and Communications w/ AHC	8.2	\$10,093.00
PU11	Plan & Disclosure Statement	24.8	\$29,940.00
	<b>TOTALS:</b>	<b>43.6</b>	<b>\$49,834.50</b>

**EXHIBIT B**

**Professional and Paraprofessional Fees**

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE STATEMENT PERIOD**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1470.00	20.1	\$29,547.00
Jennifer S. Feeney ("JSF") Of Partner	1998	\$940.00	14.0	\$13,160.00
Erik B. Weinick ("EBW") Partner	2002	\$895.00	7.0	\$6,265.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$345.00	2.5	\$862.50
	<b>TOTAL</b>		<b>43.6</b>	<b>\$49,834.50</b>



**EXHIBIT C**

**Time Detail**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

January 14, 2022  
BILL NO. 221103

For Services Rendered Through December 31, 2021:

Phase: PU04		CASE ADMINISTRATION	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/28/21 JKH	Diary & Docket Review docket and calendar all omnibus hearing dates	.30	103.50
TOTAL PHASE PU04		.30	\$103.50

Phase: PU06		EMPLOYMENT & FEE APPLICATIONS	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/07/21 JSF	Examine Documents Review of November Time Detail	.40	376.00
12/08/21 JSF	Examine Documents November Monthly Fee Statement	.30	282.00
12/08/21 JKH	Prepare Papers Prepare draft November monthly statement	.80	276.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/13/21 JSF	Examine Documents November Fee Statement for Filing	.20	188.00
12/13/21 JKH	Diary & Docket Finalize November monthly statement for filing and calendar objection deadline	.10	34.50
12/16/21 JSF	Telephone Call(s) Participate in Omnibus Hearing re: Fee Applications	1.10	1,034.00
TOTAL PHASE PU06		2.90	\$2,190.50

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Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/21 JSF	Telephone Call(s) Attend Videoconference re: Insurance Litigation	1.20	1,128.00
12/01/21 JSF	Examine Documents Review of Insurance Adversary Summary Materials	.30	282.00
12/01/21 MLC	Conference call(s) Conference call re: insurance settlement report presented by Gilbert law firm	1.10	1,617.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/08/21 JSF	Correspondence Gilbert Law re: Response to Insurance Discovery Requests	.30	282.00
12/08/21 JSF	Examine Documents Attention to Issues re: Responses to Discovery Requests	.60	564.00
12/08/21 MLC	Correspondence Correspondence with Gilbert firm re: discovery production	.60	882.00
12/08/21 JKH	Research Review of documents in connection with insurance litigation and discovery	.90	310.50
12/09/21 JSF	Examine Documents Review of E-Mails for Response to Insurance Discovery Requests	.60	564.00
12/10/21 JKH	Review Documents Review documents in connection with insurance litigation and discovery	.40	138.00
12/15/21 JSF	Examine Documents Review of E-Mails re: Insurance Document Discovery	.60	564.00
12/16/21 MLC	Correspondence Correspondence re: discovery requests concerning insurance litigation	.80	1,176.00

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TOTAL PHASE PU08 7.40 \$7,507.50

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Phase: PU09 MEETINGS & COMMUNICATIONS W/ AD HOC

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/21 JSF	Telephone Call(s) Attend Weekly Meeting of AHC	.90	846.00
12/01/21 MLC	Conference out of Office Committee meeting AHC	.90	1,323.00
12/09/21 MLC	Conference call(s) Conference call with State subgroup and AHC counsel re: status of SDNY filings	.50	735.00
12/20/21 JSF	Telephone Call(s) Attend AHC Meeting re: Update on Appeal Decision	1.50	1,410.00
12/20/21 MLC	Conference call(s) Committee Meeting	1.50	2,205.00
12/21/21 MLC	Conference call(s) Conference call with co-counsel and certain States' representatives	.60	882.00
12/22/21 JSF	Telephone Call(s) Attend Weekly Meeting of AHC	.80	752.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/22/21 MLC	Conference call(s) Conference call with AHC Committee	1.00	1,470.00
12/29/21 JSF	Telephone Call(s) Attend Via Zoom Weekly AHC Meeting	.50	470.00
TOTAL PHASE PU09		8.20	\$10,093.00

Phase: PU11

PLAN & DISCLOSURE STATEMENT

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/21 MLC	Review Documents Review and analysis of McMahon docket entry set of questions	.60	882.00
12/02/21 MLC	Conference call(s) Conference call with ADH counsel and State subgroup re: J. McMahon questions	.40	588.00
12/04/21 MLC	Review Documents Review of draft of supplemental brief in support of confirmation by AHC	1.30	1,911.00
12/05/21 MLC	Review Documents Review of proposed revisions to draft supplemental memo to file in SDNY appeal case	1.40	2,058.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/07/21 JSF	Examine Documents Review of Supplemental Briefing re: Appeal of Confirmation Order	1.30	1,222.00
12/08/21 EBW	Analysis of Legal Papers Review of appellate briefs and post-argument briefs.	3.10	2,774.50
12/08/21 MLC	Review Documents Review and analysis of summary of supplemental briefs filed in SDNY	2.20	3,234.00
12/09/21 EBW	Analysis of Legal Papers Review of case updates re: Appeal of Confirmation Order	1.70	1,521.50
12/09/21 MLC	Correspondence Correspondence with States' subgroup re: prospective SDNY decision	.20	294.00
12/10/21 MLC	Review Documents Review of court docket ruling in SDNY	.70	1,029.00
12/15/21 JSF	Examine Documents Review of NOAT Distribution Procedures re: Response to Inquiry	.80	752.00
12/16/21 JSF	Examine Documents Review of District Court Order Vacating Confirmation Order	1.40	1,316.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/16/21 JSF	Telephone Call(s) Call with Co-Counsel to Discuss District Court Vacatur	1.20	1,128.00
12/16/21 EBW	Analysis of Legal Papers Analysis of district court decision.	2.20	1,969.00
12/16/21 MLC	Conference call(s) Conference call with AHC co-counsel re: SDNY Appellate decision	1.20	1,764.00
12/16/21 MLC	Review Documents Review and analysis of District Court opinion	1.20	1,764.00
12/22/21 MLC	Telephone Call(s) Telephone call with Irve Goldman re SDNY decision vacating confirmation order	.50	735.00
12/22/21 MLC	Correspondence Correspondence with AHC co-counsel re: debtors' motion for extension of the injunction	.30	441.00
12/22/21 MLC	Conference call(s) Conference call with DPW and AHC counsel re: District Court Decision	1.80	2,646.00
12/31/21 MLC	Review Documents Review of debtors' papers in support of certification of appeal	1.30	1,911.00



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TOTAL PHASE PU11	24.80	\$29,940.00
	TOTAL FOR SERVICES	\$49,834.50

**EXHIBIT D**

**Summary of Actual and Necessary Expenses**

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE  
STATEMENT PERIOD**

<b>Expense Category</b>	<b>Total Expenses</b>
Taxis	\$56.36
<b>TOTAL:</b>	<b>\$56.36</b>

**EXHIBIT E**

**Expense Detail**

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NEW YORK, NY 10169-0075

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January 14, 2022  
BILL NO. 221103

DISBURSEMENTS FOR YOUR ACCOUNT

Taxis	56.36
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TOTAL DISBURSEMENTS	<hr/> 56.36
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